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Attorneys for Defendants
Las Vegas-Clark County Library District and
Ronald R. Heezen

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WILLIAM DEANS, an individual,

Plaintiff,

vs.

LAS VEGAS CLARK COUNTY LIBRARY
DISTRICT; RONALD R. HEEZEN, (in his
official capacity); COLLEGE OF SOUTHERN
NEVADA; ANTONIA MARIE SUMMERLIN
(Badge No. 228) (in her personal and official
capacity); RANDALL PERKINS (Badge No.
104) (in his professional capacity); JANE DOE;
JOHN ROE; and JANE POE,

Defendants.

Case No. 2:16-cv-02405-APG-PAL

STIPULATION AND ORDER TO FILE AMENDED COMPLAINT

Pursuant to FRCP 15, LR 7-1, and LR IA 6-2, Defendants Las Vegas-Clark County Library District (“Library District”), Ronald R. Heezen (“Heezen”), College of Southern Nevada (“CSN”), Antonia Marie Summerlin (“Summerlin”), and Randal Perkins (“Perkins”) (collectively, the “Defendants”); and Plaintiff William Deans (“Deans” or “Plaintiff”)¹ by and through their counsel of record, hereby submit this stipulation permitting Deans to file an Amended Complaint and setting Defendants’ time to respond to the Amended Complaint.

¹ Deans and Defendants shall be referred to collectively as the “Parties.”

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1. WHEREAS, Deans filed his Complaint [ECF No. 1] and an Emergency Motion for Temporary Restraining Order and Motion for Preliminary Injunction [ECF No. 3] on October 15, 2016;

2. WHEREAS, the Court held a hearing on Deans' Motion for Temporary Restraining Order on October 17, 2016, and granted the Motion in part (*see* Minutes of Proceedings [ECF No. 7]);

3. WHEREAS, at the hearing on Deans' Motion for Temporary Restraining Order, the Court further ordered a briefing schedule on Deans' Motion for Preliminary Injunction and set an evidentiary hearing to take place on November 1, 2016;

4. WHEREAS, at the November 1, 2016 hearing on Deans' Motion for Preliminary Injunction, the Court heard arguments of counsel, heard testimony of witnesses, and admitted exhibits;

5. WHEREAS, at the conclusion of the November 1, 2016 hearing, the Court took the matter under advisement and ordered that the temporary restraining order remain in effect subject to additional restrictions pending further order of the Court (*see* Minutes of Proceedings [ECF No. 21]);

6. WHEREAS, Deans wishes to amend his Complaint based on the evidence and argument offered at the November 1, 2016 hearing; and

7. WHEREAS, the Parties wish to make efficient use of the Parties' and judicial resources;

8. THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:

- a. Deans shall file an Amended Complaint within twenty (20) days of the filing of the Court's order on Dean's Motion for Preliminary Injunction.
- b. Defendants need not respond to the October 15, 2016 Complaint, and instead, shall have up to and including twenty (20) days to respond to the Amended Complaint.

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c. Notwithstanding this Stipulation, Defendants reserve the right to assert any all defenses under FRCP 12 and all other applicable law.

Dated: November 7, 2016

Dated: November 7, 2016

Dated: November 7, 2016

By: /s/ Marc J. Randazza
**RANDAZZA LEGAL
GROUP, PLLC**
MARC J. RANDAZZA
ALEX J. SHEPARD
D. GILL SPERLEIN

By: /s/ Kelly B. Stout
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DENNIS L. KENNEDY
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By: /s/ Richard L. Hinckley
**COLLEGE OF
SOUTHERN NEVADA**
RICHARD L. HINCKLEY
DIANE L. WELCH

Attorneys for Plaintiff
WILLIAM DEANS

Attorneys for Defendants
LAS VEGAS-CLARK
COUNTY LIBRARY
DISTRICT and RONALD R.
HEEZEN

Attorneys for Defendants
COLLEGE OF SOUTHERN
NEVADA; ANTONIA MARIE
SUMMERLIN; and
RANDALL PERKINS

IT IS SO ORDERED:


UNITED STATES DISTRICT COURT JUDGE

Dated: November 8, 2016

Respectfully Submitted by:

BAILEY❖KENNEDY

By: /s/ Kelly B. Stout
DENNIS L. KENNEDY
KELLY B. STOUT

Attorneys for Defendants
LAS VEGAS-CLARK COUNTY
LIBRARY DISTRICT and RONALD R.
HEEZEN